

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

CIVIL ACTION NO: 05-CV-40072 FDS

LANDWORKS CREATIONS, LLC	)
	)
Plaintiff	)
	)
v.	)
	)
UNITED STATES FIDELITY AND	)
GUARANTY COMPANY and	)
LOVETT-SILVERMAN CONSTRUCTION	)
CONSULTANTS, INC.	)
	)
Defendants	)

SECOND ASSENTED TO MOTION TO EXTEND TIME TO RESPOND TO DEFENDANT,  
USF & G'S MOTION FOR A PROTECTIVE ORDER UNTIL JULY 30, 2007

Now comes the Plaintiff, Landworks Creations, LLC., and moves for an extension until July 30, 2007 to respond to the Motion for a Protective Order filed by Defendant USF & G ("the Moving Party"). As grounds for this motion, the Plaintiff states that the parties are actively working toward resolution of this dispute, or at least substantially narrowing the issues to be presented to the Court. It is expected that a resolution will either be reached or, in the alternative, that the extension of July 30, 2007 will provide sufficient time for the Plaintiff to respond to the moving papers.

Respectfully Submitted,

**Landworks Creations, LLC**

By its attorney,

s/Robert N. Meltzer  
The Mountain States Law Group  
Robert N. Meltzer, BBO #564745  
P.O. Box 1459  
Framingham, MA 01701  
Phone: (508) 872-7116

Assented to:

For the Moving Party,

United States Fidelity & Guaranty Co.

s/Eric Hipp  
Eric Hipp, BBO #642658  
Hermes, Netburn, O'Connor & Spearing  
265 Franklin Street, Seventh Floor  
Boston, MA 02109  
Phone: (617) 728-0050

July 19, 2007

CERTIFICATE OF SERVICE

I, Robert N. Meltzer, do hereby certify that on this 19th of July, 2007 I served a copy of the foregoing on the following counsel of record by first class mail, postage prepaid:

Hermes, Netburn, O'Connor & Spearing  
265 Franklin Street, Seventh Floor  
Boston, MA 02109  
Attn: Eric Hipp, Esq.

Donovan Hatem  
World Trade Center East  
Two Seaport Lane  
Boston, MA 02210  
Attn: Julie Ciollo, Esq.

s/Robert N. Meltzer